

June 29, 2023

Ms. Sophie Shulman
Deputy Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590

Re: Agency Information Collection Activities; Notice and Request for Comment; State Data Transfer for Vehicle Crash Information; Docket No. NHTSA-2023-0019, Document Number: DOT-NHTSA- 2023-09357

Dear Acting Administrator Carlson:

On May 3, 2023, the National Highway Traffic Safety Administration (“NHTSA”) published in the Federal Register a Notice and request for comments on a request for approval for a modification of a currently approved information collection. to modify NHTSA's existing information collection for State Data Transfer (SDT) for Vehicle Crash Information SDT to account for changes resulting from the new grant program. The National Association of Mutual Insurance Companies (“NAMIC”) welcomes the opportunity to respond to this request for comments.

NAMIC membership includes more than 1,500 member companies. The association supports regional and local mutual insurance companies on main streets across America and many of the country’s largest national insurers. NAMIC member companies write \$323 billion in annual premiums. Our members account for 67 percent of homeowners, 55 percent of automobile, and 32 percent of the business insurance markets. Through our advocacy programs we promote public policy solutions that benefit NAMIC member companies and the policyholders they serve and foster greater understanding and recognition of the unique alignment of interests between management and policyholders of mutual companies.

The Infrastructure Investment and Jobs Act Section 24108 (d) authorizes the Secretary of Transportation to establish the State Electronic Data Collection (SEDC) program to provide grants to States to establish, upgrade, and standardize their centralized statewide crash data repositories to enable electronic data collection, intrastate data sharing, and electronic data transfer to NHTSA. The objective is to increase the accuracy, timeliness, and accessibility of the data, including data related to fatalities involving vulnerable road users. Through SEDC, NHTSA will award grants to States to modernize or establish a centralized statewide crash data repository to enable full electronic data transfer to NHTSA, increase their alignment to the Model Minimum Uniform Crash Criteria (MMUCC) Sixth Edition data, and transmit the data in a standardized format to NHTSA. This information collection request is to modify NHTSA's existing information collection for SDT to account for changes resulting from the new grant program.

The Notice requests comments on whether the proposed collection of information is necessary for the proper performance of the functions of the Department, including whether the information will have practical utility. To that question, NAMIC responds with a resounding “Yes, this work is critical for the proper performance of the functions of NHTSA and there is every reason to believe that the results of the study will have great practical utility.”

We do recommend you continue to seek input from the insurance industry, who have experience and expertise that is likely relevant to the goals proposed in the Notice. Specifically, the insurance industry may be able to provide NHTSA with advice and recommendations on specific metrics, key performance indicators, and measures of success that NHTSA may propose for the performance and efficacy of the proposed study. Insurance experience could also be valuable in validating the testing and efficacy in different scenarios and how that performance data could be generated. NAMIC would be most interested in working with NHTSA on these areas of study and analysis.

NAMIC is supportive of the Notice as another positive step in the possible range of testing, safety data collection, and reporting. NAMIC applauds the Notice as worthwhile action by NHTSA, and strongly urges NHTSA to consider proposing more wide and extensive auto safety data recording and reporting.

If you have any questions or require further information, please contact me at tkarol@namic.org. Thank you for your time and consideration.



Thomas J. Karol

General Counsel – Federal
National Association of Mutual Insurance Companies